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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

EENA SAESEE,)	Case No. 1:21-cv-01562-SKO
)	
Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME; ORDER
v.)	(Doc. 15)
)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the “Commissioner”), shall have an extension of time to file her opposition to Plaintiff’s opening brief in this case. In support of this request, the Commissioner respectfully states as follows:

1. Primary responsibility for handling this case has been delegated to the Office of the Regional Chief Counsel, Region IX, in San Francisco, California (the “Region IX Office”).
2. Defendant’s response to Plaintiff’s opening brief is currently due Wednesday, August 24, 2022. Defendant has previously requested one extension of time for this deadline.

3. The undersigned SAUSA assigned to this case is new to the Agency and depends on a senior attorney to review his work prior to filing before the Court.

4. Due to shifting workload caused by senior attorneys transferring to different divisions and exiting the Agency, the undersigned SAUSA has been assigned a new senior attorney reviewer and they both require more time to harmonize their briefing deadlines.

6. This request is made in good faith and is not intended to delay the proceedings.

7. On August 19, 2022, counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

WHEREFORE, Defendant requests until Friday, September 16, 2022, to file her opposition to Plaintiff's opening brief.

Respectfully submitted,

Dated: August 19, 2022

/s/ Lawrence D. Rohlfing*

LAWRENCE D. ROHLFING

Attorney for Plaintiff

*as authorized via e-mail on August 19, 2022

Dated: August 19, 2022

PHILLIP A. TALBERT

United States Attorney

PETER K. THOMPSON

Acting Regional Chief Counsel, Region IX

Social Security Administration

By: /s/ Bacilio Mendez II

BACILIO MENDEZ II

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Based upon the foregoing stipulation of the parties (Doc. 15), and for good cause shown, Fed. R. Civ. P. 16(b)(4), IT IS HEREBY ORDERED that Defendant shall have an extension of time, to and including September 16, 2022, in which to file a response to Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 9) shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 23, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE